



bc 3 A 10

August 25, 1998

Mr. Mark Poindexter
Division of Waste Management
North Carolina Department of
Environment and Natural Resources
401 Oberlin Road
Suite 150
Raleigh, North Carolina 27605



RE: Groundwater Monitoring
Jackson County MSW Landfill
Jackson County, North Carolina

Dear Mr. Poindexter:

On behalf of Jackson County, we are responding to the Divisions letter dated March 13, 1998 regarding groundwater monitoring at the Jackson County MSW Landfill. A copy of the letter is attached for your convenience.

On December 31, 1997, the Jackson County MSW Landfill was officially closed and closure construction begun. The closure consisted of placement of 18-inches clay material with maximum permeability of 1×10^{-5} cm/sec and 6-inches of vegetative cover over the waste area. The closure construction was completed on June 26, 1998.

The existing groundwater monitoring system at the Jackson County MSW Landfill consists of five (5) monitoring wells surrounding the landfill and two (2) surface water monitoring points and will remain throughout the post-closure period. Mr. Mike Owens, with Mountain Geology, Inc., has been handling the groundwater sampling and analysis for the past three (3) years. In recent years, Appendix I laboratory testing of the samples taken from the wells has indicated constituents at higher concentrations than the North Carolina Groundwater Standards. In accordance with Rule .1634 of the North Carolina Solid Waste Management Rules and conversations with Mr. Larry Rose, with the Division of Waste Management, Jackson County began to analyze the groundwater samples for Appendix II constituents on an annual basis and provide statistical comparison between the sampling data and the background well data. The latest sampling event, using the additional Appendix II parameters, was completed in November 1997. The results of the laboratory analysis did not indicate any levels above the standards for the additional Appendix II constituents, but did indicate continued concentration levels above the standard for some of the Appendix I constituents. The March 13, 1998 letter from the State required Jackson County to complete the remaining portions of Rules .1634, .1635, .1636, and .1637 due to the continued presence of these contaminants.

Engineering • Planning • Finance

McGill Associates, P.A. • P.O. Box 2259, Asheville, NC 28802 • 55 Broad Street, Asheville, NC 28801
704-252-0575 • FAX 704-252-2518

We request that the Division allow Jackson County to sample the existing groundwater wells two (2) more events prior to developing any additional corrective action measures. Jackson County has already initiated a corrective action plan by closing the landfill and covering the waste area with a clay cap. The capping of the landfill will have the most dramatic effect on decreasing the levels of contaminants by cutting off the source of surface water intrusion. In fact, the March 1998 sampling event indicated reductions in levels of some of the measurable Appendix I constituents with only a partial cap on the landfill. There has not been any groundwater samples taken since the completion of the landfill cap. The next scheduled sampling event is in September 1998, which will include Appendix II analysis. The development and implementation of a plan prior to knowing the effect of capping the landfill could result in a plan, which is ineffective in monitoring and identifying the characteristics of the contamination. Following the sampling event in March 1999, Jackson County can assess the current situation and develop an effective corrective action plan, if required.

In addition, the letter from the Division was addressed to Mr. Eldon Cabe. Mr. Cabe has not worked with Jackson County for several years. As a result, the proper personnel did not receive the letter. Please address future correspondence to Mr. Dave Fowler, Executive Director of Services, Jackson County, 401 Grindstaff Road, Sylva, North Carolina 28779.

Please call if have any questions or need additional information.

Sincerely,

McGILL ASSOCIATES, P.A.

A handwritten signature in dark ink, appearing to read "Jeffrey R. Bishop", with a stylized, sweeping flourish at the end.

JEFFREY R. BISHOP, P.E.

JAO/jrb

cc: Mr. Dave Fowler, Jackson County
Mr. Julian Foscue
Mr. Jim Patterson
Mr. Mike Owens